

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON,

:

Plaintiff,

:

v.

:

CIVIL NO. S-02-2803

**JOHN E. POTTER, Postmaster General, :
United States Postal Service,**

Defendant.

:

**MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

NOW, comes Plaintiff, Delois Edmondson, ("Edmondson"), by and through her attorney, Morris E. Fischer, Esq., Snider & Fischer, L.L.C., with the consent of the Defendant, John E. Potter, Postmaster General, United State Postal Service, ("USPS"), and his counsel, John Sipple, Esq., Assistant United States Attorney, and files her Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment. For cause, Plaintiff states that the parties have amicably agreed to extend Plaintiff's time to respond to Defendant's motion to Monday, September 22, 2003 as additional time is required. The Defendant, by and through the Assistant United States Attorney, has given its consent to the proposed extension of time.

WHEREFORE, Plaintiff respectfully requests that she be allowed up to and inclusive of **September 22, 2003,** within which to file her response.

Respectfully submitted,

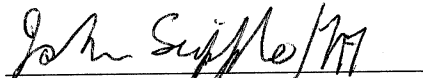


Morris E. Fischer, Esq.

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We Consent:

THOMAS M. DIBIAGIO
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "John Sipple", followed by a horizontal line.

John Sipple, Esq.
Assistant U.S. States Attorney
Fed. Bar No. 25484
604 U.S. Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201-2692
P: (410) 209-4807
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Of Counsel:

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Capital Metro Law Department
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Washington, D.C. 20024-2730

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON,

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Plaintiff,

:

v.

:

CIVIL NO. S-02-2803

**JOHN E. POTTER, Postmaster General, :
United States Postal Service,**

Defendant.

:

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS OR, IN THE ALTERNATIVE,
FOR SUMMARY JUDGMENT**

Plaintiff, Delois Edmondson, ("Edmondson"), by and through her attorney, Morris E. Fischer, Esq., Snider & Fischer, L.L.C., has submitted with the Court a Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment and files this Memorandum in support thereof. The grounds for Plaintiff's motion are as follows:

1. On August 8, 2003, the parties agreed to extend Plaintiff's time to respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment to Monday, September 22, 2003. A copy of the parties Stipulation is attached hereto as Exhibit 1.
2. On August 13, 2003, Plaintiff received a copy of Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment.
3. Plaintiff needs additional time to respond to Defendant's Motion.
4. Defendant and its counsel have given their consent to Plaintiff's Motion.

For these reasons, Plaintiff has submitted to the Court her Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment along

with this Memorandum. Plaintiff respectfully requests that the Court grant her Motion and extend her time to respond to Defendant's Motion to Monday, September 22, 2003.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. E. Fischer". The signature is fluid and cursive, with the first name "Morris" and last name "Fischer" clearly legible.

Morris E. Fischer, Esq.
Snider & Fischer, L.L.C.
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EXHIBIT 1

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SNIDER FISCHER LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

DELOIS EDMONSON

Plaintiff,

v.

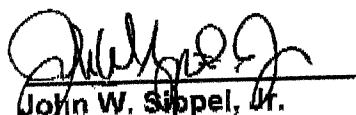
Civil Action No. S-02-2803

JACK POTTER,
POSTMASTER GENERAL
United States Postal Service


Defendant,

STIPULATION

It is hereby agreed by and between the parties that Plaintiff's time to respond to Defendant's Summary Judgment motion shall be extended to Monday, September 22, 2003.



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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON,

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Plaintiff,

:

v.

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CIVIL NO. S-02-2803

**JOHN E. POTTER, Postmaster General, :
United States Postal Service,**

Defendant.

:

ORDER

Plaintiff, Delois Edmondson, ("Edmondson"), has filed a Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment, and the court has been advised in the premises.

It is this ____ day of _____, 2003, ORDERED that Plaintiff's Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment is GRANTED. Plaintiff shall have until September 22, 2003 to file her response papers.

The Honorable William D. Quarles
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DELOIS EDMONDSON,

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Plaintiff,

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CIVIL NO. S-02-2803

**JOHN E. POTTER, Postmaster General, :
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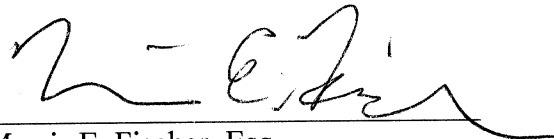
Defendant.

:

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2003 copies of Plaintiff's Motion for Enlargement of Time to Respond to Defendant's Motion to Dismiss or, in the alternative, for Summary Judgment, Memorandum in support thereof, and Proposed Order, which were electronically filed in this case on August 13, 2003, was mailed via first class mail, postage prepaid, to:

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